

JP:PTH

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960))

ROSE AMANOR,

Defendant.  
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EASTERN DISTRICT OF NEW YORK, SS:

JEFFREY FIDLER, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about February 15, 2015, within the Eastern District of New York and elsewhere, the defendant ROSE AMANOR did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and belief are as follows:<sup>1</sup>

1. On or about February 15, 2015, the defendant ROSE AMANOR arrived at John F. Kennedy International Airport in Queens, New York, aboard Delta Airlines Flight 49 from Amsterdam, Netherlands via Ghana.


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<sup>1</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. The defendant ROSE AMANOR was selected for a Customs and Border Protection ("CBP") enforcement examination. The defendant was in possession of a Ghana passport and was traveling on a B1/B2 visa. While answering standard CBP examination questions, the defendant ROSE AMANOR stated, in sum and substance and in part, that the reason for her trip to the United States was to visit her son for six months. The defendant claimed ownership of two checked bags and stated, in sum and substance and in part, that those bags and their contents belonged to her. One of the checked bags was a blue plastic bag and the other bag was a black "JRIPMAN" suitcase. During an examination of the blue plastic bag conducted by a CBP officer, the officer discovered multiple brown packages of dried fish. At that point, the CBP officer began to probe and cut some of the fish and noticed a brown powdery substance inside some of the fish. The brown powdery substance field-tested positive for the presence of heroin. The total gross weight of the heroin recovered from the blue plastic bag is approximately 3,423.1 grams.

WHEREFORE, your deponent respectfully requests that the defendant ROSE AMANOR be dealt with according to law.

Dated: Brooklyn, New York  
February 17, 2015

  
JEFFREY FIDLER  
Special Agent  
Homeland Security Investigations

Sworn to before me on  
the 17th day of February, 2015

  
THE HONORABLE STEVEN M. GOLD  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK